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Conspiracy—Elkins Act—Rebates—Punishment.—That the offense of conspiracy may be predicated of an attempt to procure a violation of the Elkins act against taking rebates, although the punishment for conspiracy is imprisonment, while the offense of taking a rebate is punishable under the Elkins act by fine only, is declared in *Thomas v. United States*, 84 C. C. A. 477, 156 Fed. 897, 17 L. R. A. (N. S.) 720.

Fixtures—Passage under Mortgage.—A gas stove and window shades running on rollers, attached by the owner to his dwelling house designed for a single family, are held, in *Hook v. Bolton* (Mass.) 85 N. E. 175, 17 L. R. A. (N. S.) 699, not to be fixtures which will pass with a mortgage of the realty.

Bankruptcy Act—Section 4b as Amended—Trading or Mercantile Pursuits—Corporation Conducting a Stock Brokerage Business.—In *Laker v. The George H. Stapley Co.* (D. C., Ohio), 21 Am. B. R. 303, it has been held that a corporation principally engaged in dealing in stocks and securities is neither a "trading" nor "mercantile" pursuit within the meaning of § 4b as amended of the Bankruptcy Act, 1898, and is not subject to adjudication.

Bankruptcy Act—Section 67a—Claims Which Are Recorded Only in One Place Where Statute Required Record in Two—Is a Failure of Record.—In *Matter of Dudley S. McDonald* (D. C., Mass.), 21 Am. B. R. 358, it was held that where a mortgage given in perfect good faith, by a Massachusetts debtor, is recorded only in the office of the clerk of the city of Boston, where the debtor had his place of business, the failure to record the mortgage in the place of his residence, as required by the State law, must be treated as a total failure of record, and section 67a of the Bankruptcy Act, 1898, which provides that claims which for want of record would not have been valid liens as against the claims of creditors, shall not be liens against the estate of a bankrupt, applies, and the mortgage is invalid as against the trustee in bankruptcy of the mortgagor.

Bankruptcy Act—Assets—Life Insurance Policies—When Trustee Does Not Take Title.—In *Matter of Pfaffinger* (D. C. Ky.), 21 Am. B. R. 255, it was recently held that where a policy of insurance upon a husband's life is payable to his wife, but under the contract he may, with the consent of the insurance company, change the beneficiary, the policy does not pass to his trustee in bankruptcy, and the fact that after his adjudication he applied in his own name for the surrender value of the policy, which was not paid to him, does not affect the rights of the wife thereunder.